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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER
V. COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in support of Uber’s Motion for Entry of an Order to Show Cause Why 7 Plaintiffs Who Have
5 Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with Prejudice.

6 2. In an effort to seek Plaintiffs’ agreement to the relief sought in the above-referenced motion,
7 counsel for Uber initiated a meet-and-confer process.

8 3. On October 6, 2025, I sent a letter on behalf of Uber to Plaintiffs’ counsel, copying MDL
9 leadership, that requested to promptly meet and confer regarding the aforementioned Plaintiffs’
10 noncompliance with the Receipt Order. The letter stated that the cases of those Plaintiffs should be
11 dismissed with prejudice. A true copy of the letter to Plaintiffs’ counsel is attached as **Exhibit 16**.

12 5. On October 7, 2025, I had a meet-and-confer via Zoom with the Pulaski Firm, counsel for
13 Plaintiffs with MDL IDs 3666, 3699, and 3787. No agreement was reached with counsel regarding the
14 dismissal of these Plaintiffs’ cases with prejudice or the deposition of Plaintiff with MDL ID 3621.

15 6. On October 8, 2025, I had a meet-and-confer via Zoom with Peiffer Wolf Carr Kane Conway &
16 Wise, counsel for Plaintiff with MDL ID 3921. No agreement was reached with counsel regarding the
17 dismissal of this Plaintiff’s case with prejudice.

18 7. On October 10, 2025, I had a meet-and-confer via Zoom with Reich and Binstock, LLP, counsel
19 for Plaintiffs with MDL IDs 3877, 3962, and 3977. No agreement was reached with counsel regarding
20 the dismissal of these Plaintiffs’ cases with prejudice or the deposition of Plaintiff with MDL ID 3962.

21 8. Although Uber has made every effort to meet and confer on this cross-cutting issue affecting
22 several Plaintiffs, as well as many counsel, it has not been possible to reach agreement. Rather than
23 attempting to address this issue piecemeal, Uber submits that the relief requested is the most efficient way
24 to proceed for all parties and the Court.

25 I declare under the penalty of perjury under the laws of the United States that the foregoing is
26 true and correct.

Dated: October 13, 2025

Respectfully submitted,



By: _____
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